## BRC COMMISSION SUMMARY OF COMMENTS 9-13-2011

## CITY OF CARLSBAD, NM MAYOR'S NUCLEAR TASK FORCE

BY: JOHN HEATON

Our comments and recommendations come from the Mayor's Nuclear Task Force, which is made up of some 30 members of the community from diverse backgrounds, concerned about the future of their city and the country. The Task Force meets weekly and it is extremely serious and committed to finding a solution to the "back-end" of the fuel cycle and clean-up of the weapons complex.

## A summary of our presentation is as follows:

- 1. A brief introduction as to who the Task Force is and a reminder to the commission that we not only have the only licensed deep geologic repository in the country, and we have lived the drama of the process. Also, we are engaged in creating an interim storage facility at this time.
- 2. A recommendation that government owned waste and defense waste be separated from civilian used fuel because they have different responsible parties, financial sources, time frames, used fuel has value whereas the DHLW has none and it is the next logical step for confidence building.
- 3. A recommendation that existing infrastructure, underground facilities, skilled labor, access and scientific support should be used to investigate any proposed media to reduce costs by hundreds of millions and decrease time to a decision as to media robustness by decades.
- 4. A recommendation that because of SE New Mexico's acceptance of generic testing in salt for heat generating HLW, and the Governor's support for following the science, WIPP should be recommended for salt testing and other sites should also be recommended for different media generic testing. This is expedited testing, NOT siting.
- 5. Interim Storage is very well explained and the essential role it must play in an integrated system. However, because we are presently engaged in developing interim storage we have a number of suggestions related to enhancing and clarifying the path forward.
- 6. We would also recommend the report clarify and better explain the rail system in the U.S. as to how it works because DHLW and SNF will be transported via rail. While WIPP provides a very good collaborative model for developing community and state acceptance, integrating rail transport with all the exceptions trucking accommodates is a different challenge.
- 7. You have done an excellent job with explaining the need for a Federal Corporation which we whole heartily endorse, and would only make a recommendation to analyze the use of FERC as the fee arbiter because of the lack of an R&D perspective.
- 8. We would recommend some alternative suggestions related to capture of the Waste Fund from a budget and political perspective which may be more realistic. We believe an incremental approach may be more feasible.
- 9. We are making a few comments about the regulatory environment and want to emphasize that until standards are established that are clear and agreed upon, nothing goes forward. And, that performance assessment is the best we have to estimate uncertainty and risk.
- 10. We strongly support international collaboration, not duplicating R&D and lessons learned.